

EXHIBIT A

EXHIBIT A - Proposed Schedule

I. Lead Counsel Applications

- a. Opening submission: Nov. 10, 2015 (10 pages)
- b. Opposing or responsive submissions: Nov. 17, 2015 (5 pages)

II. Deadline for Filing of Consolidated Amended Complaints (“CACs”):

- a. 35-50 days after appointment of lead counsel.

III. Motions to Dismiss

- a. *Plaintiff’s Position:*
 - i. Answers or Motions to Dismiss: 35 days after filing of CACs⁷
 - ii. Oppositions to Motions: 35 days after filing of Motions
 - iii. Replies in Support of Motions: 21 days after Oppositions
- b. *Defendants’ Position:*
 - i. Defendants propose 45 days for III(a)(i) & (ii), but agree on (iii).

IV. Discovery

- a. *Plaintiff’s Position:*
 - i. Commencement of Discovery: 7 days after appointment of lead counsel
 - ii. Filing of Protective Order (or competing protective orders if the parties do not agree): 14 days after appointment of lead counsel
 - iii. Rule 26(a)(1) Disclosures: 14 days after filing of CACs
- b. *Defendants’ Position:*
 - i. Discovery should be stayed. *See* Report Sections IV & V.A.2.

V. Class Certification

- a. *Plaintiff’s Position:*
 - i. Deadline for Filing of Motion for Class Certification: 180 days after filing of CACs⁸
 - ii. Deadline for Filing of Opposition to Motion for Class Certification: 35 days after filing of motion
 - iii. Deadline for Filing Any Reply Brief to Motion for Class Certification: 21 days after filing of opposition brief
- b. *Defendants’ Position:*
 - i. Class certification briefing is premature. *See* Report Sections IV & V.E.

⁷ Defendants reserve their right to file 12(b)(1) motions or motions to compel arbitration later in the briefing process. If the Court prefers that Defendants present all 12(b)(6), arbitration, and personal jurisdiction issues for hearing at the same time, Defendants of course will do so. Plaintiffs believe all disputed jurisdictional and arbitration issues should be resolved at the outset of the litigation.

⁸ Plaintiff request leave from Local Rule 23-3 to take necessary discovery of Defendants and have the Court’s ruling on any motions to dismiss before filing for class certification, which should conserve resources for the Parties and the Court.